

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Civil No. 21-cv-10928

v.

Honorable Denise Page Hood

\$3,840,772.58 U.S. dollars constituting
125 international wire transfers seized
From U.S. correspondent bank, Citibank,
between December 21, 2020 and
January 4, 2021,

\$1,025,446.18 U.S. dollars constituting
42 international wire transfers seized
from U.S. correspondent bank, JPMorgan
Chase Bank, between December 21, 2020
and January 4, 2021,

\$765,143.73 U.S. dollars constituting
40 international wire transfers seized
from U.S. correspondent bank, Bank of
New York Mellon, between December 21,
2020 and January 4, 2021,

\$145,466.52 U.S. dollars constituting
6 international wire transfers seized
from U.S. correspondent bank, Mashreq
Bank PSC, between December 21, 2020
and January 4, 2021,

\$387,337.51 U.S. dollars constituting
13 international wire transfers seized
from U.S. correspondent bank, Standard
Chartered Bank, between December 21,
2020 And January 4, 2021,

\$159,616.77 U.S. dollars constituting
6 international wire transfers seized
from U.S. correspondent bank, Deutsche
Bank Trust Company Americas, between
December 21, 2020 and January 4, 2021,

\$2,288,936.63 U.S. dollars constituting
67 wire transfers seized from U.S.
correspondent bank, Citibank, N.A.,
between May 3, 2021 and May 21, 2021,

\$1,449,112.82 U.S. dollars constituting
44 wire transfers seized from U.S.
correspondent bank, JPMorgan Chase Bank,
between May 3, 2021 and May 21, 2021,

\$1,348,713 U.S. dollars constituting
44 wire transfers seized from U.S.
correspondent bank, Bank of America,
between May 3, 2021 and May 21, 2021,

\$636,373.90 U.S. dollars constituting
28 wire transfers seized from U.S.
correspondent bank, Bank of New York
Mellon between May 3, 2021 and May 21,
2021,

\$20,155 U.S. dollars constituting
2 wire transfers seized from U.S.
correspondent bank, Deutsche Bank
and Trust Company Americas; between
May 3, 2021 and May 21, 2021, and

\$34,000 U.S. dollars constituting
2 wire transfers seized from U.S.
correspondent bank, Mashreq Bank PSC,
between May 3, 2021 and May 21, 2021,

Defendants,

LDK TEXTILE TRADING, LLC

Claimant.

VERIFIED CLAIM

Claimant LDK Textile Trading, LLC, by and through Undersigned Counsel, hereby files this Verified Claim pursuant to 18 U.S.C. § 938(a)(4)(A) and Rules G(5)(a) of the Supplemental Rules for Certain Admiralty and Maritime Claims, and hereby states the following:

1. The identities of the specific properties being claimed are the funds associated with the following wire transactions, as identified in the Second Amended Complaint for Forfeiture in the above-styled case:

Wire No.	Wire Date	Amount
117	1/4/2021	\$19,817.00
118	1/4/2021	\$34,977.00
119	12/28/2020	\$10,977.00
120	12/24/2020	\$32,975.00
121	12/23/2020	\$20,605.00
122	12/23/2020	\$22,955.00
123	12/23/2020	\$23,552.00
124	12/23/2020	\$24,930.00
125	12/23/2020	\$39,955.00
126	12/23/2020	\$39,955.00
127	12/23/2020	\$53,690.00

2. The identity of Claimant is LDK Textile Trading, LLC (“Claimant LDK Textile”). Claimant LDK Textile is a foreign company established under the laws of the country of the United Arab Emirates with its primary office located at OFFICE 211 SHUKARAALLAH BUILDING NAIF DEIRA DUBAI DUBAI UAE.

3. Claimant LDK Textile has a valid and legal interest in all of the seized properties listed in Paragraph 1 of this Verified Claim as Claimant LDK Textile is the corporate owner of all of the seized properties.

4. Mujahid Ahmed Peerathi is the sole owner of Claimant LDK Textile.

5. Claimant LDK Textile acquired the properties listed in Paragraph 1 of this Verified Claim through lawful and legitimate means. This 31st day of January 2022.

/s/Rebecca L. Castaneda
Rebecca L. Castaneda
Florida Bar No. 1007926
rc@attorneyrebeccacastaneda.com
The Castaneda Law Firm PLLC
506 N. Armenia Avenue
Tampa, Florida 33609-1703
(813) 694-7780

VERIFICATION

Pursuant to 28 U.S.C. § 1746, Mujahid Ahmed Peerathi, owner of Claimant LDK Textile, hereby declares under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 28th day of January 2022.

P. Mujahid

Mujahid Ahmed Peerathi
Owner of LDK Textile Trading, LLC



CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Verified Claim has been electronically filed on January 31, 2022, with the Clerk of the Court using the CM/ECF system which will automatically transmit an electronic filing to all parties of record.

s/Rebecca L. Castaneda
Rebecca L. Castaneda
Florida Bar No. 1007926
rc@attorneyrebeccacastaneda.com
The Castaneda Law Firm PLLC
506 N. Armenia Avenue
Tampa, Florida 33609-1703
(813) 694-7780